

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COMMUNITIES UNITED,
COMMUNITY RENEWAL SOCIETY,
NEXT STEPS NFP, ONE NORTHSIDE,
and the ACLU OF ILLINOIS, on behalf of
their respective members,

Plaintiffs,

v.

THE CITY OF CHICAGO,

Defendant.

Case No. 17-cv-7151

Hon. Elaine E. Bucklo

**DEFENDANT’S MOTION FOR LEAVE TO FILE ITS MOTION TO DISMISS THE
AMENDED COMPLAINT IN EXCESS OF 15 PAGES *INSTANTER***

Defendant, the City of Chicago (“City”), by its undersigned counsel and pursuant to Local Rule 7.1, moves for leave to file its Motion to Dismiss the Amended Complaint in excess of 15 pages. In support of its motion, the City states:

1. On November 28, 2017, Plaintiffs filed a six-count, eighty-four page Amended Complaint against the City.

2. The Court granted the City’s motion for an extension of time to file their responsive pleadings, allowing the City until January 12, 2018 to answer or otherwise plead.

3. In order for the City to fully address all of the issues raised by the six-count Complaint, the City requires a motion to dismiss of forty-seven pages, excluding the table of contents and table of cases required by Local Rule 7.1. A copy of the City’s Proposed Motion to Dismiss the Amended Complaint is attached hereto.

WHEREFORE, the City asks that this Court grant its motion, grant the City leave to file its Motion to Dismiss the Amended Complaint of forty-seven pages *instanter*, and grant such other and further relief as the Court deems just.

Dated: January 12, 2018

Respectfully submitted,

CITY OF CHICAGO

By: s/ Allan T. Slagel
One of its Attorneys

Allan T. Slagel (ARDC No. 6198470)
Heather A. Jackson (ARDC No. 6243164)
Elizabeth E. Babbitt (ARDC No. 6296851)
Rachel L. Schaller (ARDC No. 6306921)
Jeffrey M. Schieber (ARDC #6300779)
TAFT STETTINIUS AND HOLLISTER LLP
111 East Wacker Drive
Suite 2800
Chicago, Illinois 60601
Telephone: (312) 527-4000
Email: aslagel@taftlaw.com
hjackson@taftlaw.com
ebabbitt@taftlaw.com
rschaller@taftlaw.com
jschieber@taftlaw.com

21880861.1